

Los Angeles County Municipal Storm Water Permit (Order 01-182)
Individual Annual Report Form
Attachment U-4

This form summarizes the requirements in Order No. 01-182. Each Permittee must complete this form in its entirety, except for those requirements applicable only to the Principal Permittee. Only report activities that were performed during the previous fiscal year. Upon completion, this form shall be submitted to the Principal Permittee, by the date specified by the Principal Permittee, for inclusion in the unified Annual Storm Water Program Report. Attachments should be included where necessary to provide sufficient information on program implementation.

The goals of this Report are to: 1) concisely document implementation of the Storm Water Quality Management Program (SQMP) during the past fiscal year; 2) evaluate program results for continuous improvement; 3) to determine compliance with Order 01-182; and 4) to share this information with other Permittees, municipal decision makers, and the public.

!	YOU MUST FILL OUT ALL THE INFORMATION REQUESTED <i>Do not leave any of the sections blank.</i>
N/A	If the question does not apply to your municipality, please indicate N/A in the space provided and provide a brief explanation
U	If the information requested is currently unavailable, please indicate U in the space provided and give a brief explanation.

This Report Form consists of the following sections:

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A. Permittee Name: City of Pomona

B. Permittee Program Supervisor: Marla Doyle, P.E.

Title: Interim Deputy Director/City Engineer

Address: 505 S. Garey Avenue

City: Pomona

Zip Code: 91766

Phone: (909) 620-3717

Fax: (909) 802-7601

C. In the space below, briefly describe how the storm water program is coordinated within your agency's departments and divisions. Include a description of any problems with coordination between departments. To facilitate this, complete the Table 1.

The City of Pomona's Stormwater Management Program is facilitated by the Public Works Department - Environmental Services Section in cooperation with the various departments (i.e. Planning, Building & Safety, and Economic Re-Development/Housing Department) and divisions responsible for permit tasks specific to their area of responsibility. The relationship between the various department/division staff is that of a collaborative effort. The ongoing support and assistance from all departments and divisions is the key to our success with the Stormwater Management Program.

TABLE 1 - Program Management

Storm Water Management Activity	Division/Department	# of Individuals Responsible for Implementing
1. Outreach & Education	Environmental Services/ Public Works	1 PT Consultant
2. Industrial/Commercial Inspections	Environmental Services/ Public Works	1 PT Consultant
3. Construction Permits/Inspections	Environmental Services/ Public Works	3 & 1 PT Consultant
4. IC/ID Inspections	Environmental Services/ Public Works	1
5. Street sweeping	Street Operations/Public Works	4
6. Catch Basin Cleaning	Street Operations/Public Works	3
7. Spill Response	Street Operations/Public Works	5 & Los Angeles County Fire HazMat
8. Development Planning (project/SUSMP review and approval)	Environmental Services/ Public Works	1 PT Consultant
9. Trash Collection	Parks/Community Services/Utilities	4 & Contractor

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D. Staff and Training

Due to significant changes in staff reductions and budget constraints, training has been minimized.

E. Budget Summary

1. Does your municipality have a storm water utility? Yes ☐ No ☒

If no, describe the funding source(s) used to implement the requirements of Order No. 01-182.

The City's General Fund supports the Stormwater Management Program in its entirety.

2. Are the existing financial resources sufficient to accomplish all required activities? Yes ☐ No ☒

3. Complete Table 2 to the extent that accurate information is available (indicate U in the spaces where the information is unavailable), and report any supplemental dedicated budgets for the same categories on the lines below the table.

4. List any additional state/federally funded projects related to storm water.

None at this time.

NOTE: The only "existing financial resource" is the City's General Fund. Utilizing these funds for the Stormwater Management Program implementation Order No. 01-182 takes away from other critical programs such as, Public Safety (i.e. Police and Fire Protection), Senior Health, Nutrition Programs, Street Maintenance/Operations and other essential community service programs.

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Program Element	Expenditures in Fiscal Year 2008-2009	Estimated Amount Needed to implement Order 01-182
1. Program management		
a. Administrative costs	\$190,928.20	\$211,466.00
b. Capital costs	Unknown	Unknown
2. Public Information and Participation		
a. Public Outreach/Education	*	\$750.00
b. Employee Training	*	*
c. Corporate Outreach	*	*
d. Business Assistance	*	*
3. Industrial/Commercial inspection/ site visit activities	**	**
4. Development Planning	**	**
5. Development Construction	**	**
a. Construction inspections		
6. Public Agency Activities		
a. Maintenance of structural and treatment control BMPs	**	**
b. Municipal street sweeping	** \$707,616.00	** \$464,207.00
c. Catch basin cleaning	**	**
d. Trash collection/recycling	**	**
e. Capital costs		
f. Other	**	**
7. IC/ID Program		
a. Operations and Maintenance	**	**
b. Capitol Costs	**	**
8. Monitoring	**	**
9. Other		
10. TOTAL	\$898,544.20	\$676,423.00

* Included within the overall Administrative costs.

** Unable to quantify elements due to “absorbing” costs into existing operational budgets for unfunded mandates.

List any supplemental dedicated budgets for the above categories:

None at this time. Most of the program/permit compliance tasks cannot be individually quantified as they have been “absorbed” into the existing operational budgets.

List any activities that have been contracted out to consultants/other agencies:

Due to lack of City staff resources, the development planning program plan checking, industrial/commercial/construction inspections have been contracted out to outside firm.

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II. Receiving Water Limitations (Part 2)

- A. Are you aware, or have you been notified, of any discharges from your MS4 that cause or contribute to a condition of nuisance or to the violation of any applicable water quality standards? Yes ☐ No ☒
- B. Has the Regional Board notified you that discharges from your MS4 are causing or contributing to an exceedance of water quality standards? Yes ☐ No ☒
- C. If you answered Yes to either of the above questions, you must attach a Receiving Water Limitations (RWL) Compliance Report. The Report must include the following:
1. A description of the pollutants that are in exceedance and an analysis of possible sources;
 2. A plan to comply with the RWL (Permit, Part 2);
 3. Changes to the SQMP to eliminate water quality exceedances;
 4. Enhanced monitoring to demonstrate compliance; and
 5. Results of implementation.

III. SQMP Implementation (Part 3)

- A. Has your agency implemented the SQMP and any additional controls necessary to reduce the discharges of pollutants in storm water to the maximum extent practicable? Yes ☒ No ☐
- B. If your agency has implemented additional or different controls than described in the countywide SQMP, has your agency developed a local SQMP that reflects the conditions in its jurisdiction and specifies activities being implemented under the appropriate elements described in the countywide SQMP? Yes ☐ No ☒
- C. Describe the status of developing a local SQMP in the box below.

Not applicable.

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- D. If applicable, describe an additional BMP, in addition to those in the countywide SQMP, that your city has implemented to reduce pollutants in storm water to the maximum extent practicable.

Not applicable.

E. Watershed Management Committees (WMCs)

1. Which WMC are you in? San Gabriel River
2. Who is your designated representative to the WMC? Jessie Powell (Consultant); Cynthia Gabaldon (Consultant)
3. How many WMC meetings did you participate in last year? 5 (estimated)
4. Describe specific improvements to your storm water management program as a result of WMC meetings.

Coordinating and sharing information between co-permittees (cities) is very helpful in keeping on top of changes in the industry, struggles and accomplishments of fellow co-permittees, RWQCB strategies and maintaining good working relationships with co-permittee staff. WMC meetings help to facilitate the collaboration and sharing of information between co-permittees which then turn to help improve the Storm Water Management Program at the City. Further, the sharing of knowledge helps to identify reasonable and cost-effective methods to the Storm Water Program to meet the requirements and assist with compliance efforts specified in Los Angeles Regional Board Order No. 01-182.

5. Attach any comments or suggestions regarding your WMC. None

F. Storm Water Ordinance

1. Have you adopted a storm water and urban runoff ordinance to enforce all requirements of Order 01-182? Yes ☒ No ☐
If not, describe the status of adopting such an ordinance.

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The City Attorney's Office updated the City's adopted Stormwater Management Ordinance, found under Chapter 18 of the Pomona City Code.

2. If yes, have you already submitted a copy of the ordinance to the Regional Board? Yes ☒ No ☐
If not, please attach a copy to this Report.
3. Were any amendments made to your storm water ordinance during the last fiscal year? Yes ☐ No ☒
If yes, attach a copy of amendments to this Report.

G. Discharge Prohibitions

1. List any non-storm water discharges you feel should be further regulated:

None at this time.

2. List any non-storm water discharges you feel should be exempt, and provide an explanation for each:

None at this time.

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IV. Special Provisions (Part 4)**A. Public Information and Participation (Part 4.B)**

In addition to answering the following questions, attach a summary of all storm water education activities that your agency conducted or participated in last year.

1. No Dumping Message

- a) How many storm drain inlets does your agency own? 504
- b) How many storm drain inlets were marked with a no dumping message in the last fiscal year? None - all were legible
- c) What is the total number of storm drain inlets that are legibly marked with a no dumping message? 504

If this number is less than the number in question 1.b, describe why all inlets have not been marked, the process used to implement this requirement, and the expected completion date.

All storm drain inlets are inspected for legibility of stenciling on an annual basis prior to October 1st. Each faded/illegible stencil is re-marked at the time of inspection. *Refer to the attachment section for the Storm Drain spreadsheet report.*

- d) How many public access points to creeks, channels, and other water bodies within your jurisdiction have been posted with no dumping signage in the past year? 0 (All are maintained by the County of Los Angeles - Flood Control District).

Describe your agency's status of implementing this requirement by the date required in Order No. 01-182.

All public access points to creeks and channels are the responsibility of the Los Angeles County Flood Control District. However, the City staff assists (as necessary) with graffiti removal from signage and notifies the County when signs are defaced, missing or in need of repair or replacement.

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2. Reporting Hotline

- a) Has your agency established its own hotline for reporting and for general storm water management information? Yes ☒ No ☐
- b) If so, what is the number? (909) 620-2224
- c) Is this information listed in the government pages of the telephone book? Yes ☒ No ☐
- d) If no, is your agency coordinated with the countywide hotline? Yes ☐ No ☐
- e) Do you keep record of the number of calls received and how they were responded to? Yes ☒ No ☐
- f) How many calls were received in the last fiscal year? 153
- g) Describe the process used to respond to hotline calls.

Phone calls are received through both the reporting hotline and the City's Public Works main line. Information is recorded on an "Incident Report Form" and calls are prioritized based on the nature of the issue. The incident may be reported to the Code Enforcement, Police Department, Appropriate City staff or County of Los Angeles, Health & Human Services Department. City staff is dispatched and/or contact is made to any supporting agency(s). A follow-up report is made to the reporting party (i.e. phone call).

- h) Have you provided the Principal Permittee with your current reporting contact information? Yes ☒ No ☐
- i) Have you compiled a list of the general public reporting contacts for all Permittees and posted it on the www.888CleanLA.com web site (Principal Permittee only)? Yes ☒ No ☐
If not, when is this scheduled to occur?

3. Outreach and Education

- a) Describe the strategy developed to provide outreach and bilingual materials to target ethnic communities. Include an explanation of why each community was chosen as a target, how program effectiveness will be determined, and status of implementation. (Principal Permittee only)

Not applicable.

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- b) Did the Principal Permittee organize quarterly Public Outreach Strategy meetings that you were aware of? Yes ☒ No ☐
- How many Public Outreach Strategy meetings did your agency participate in last year? 1
- Explain why your agency did not attend any or all of the organized meetings.

The City hosted our own Earth Day Celebration to help spread the importance of Earth Day and more importantly, show the importance of protecting stormwater by reducing or eliminating pollutants from stormwater discharges throughout the City.

Identify specific improvements to your storm water education program as a result of these meetings:

Multi-language public education materials that are made available by the Principal Permittee have proven to be valuable asset. In addition, the sharing of other agency's public education materials is a cost-effective way of making new materials available in our jurisdiction without "recreating the wheel". Stormwater related outreach materials are provided at the Public Works counter and the Kiosk desk in both English and Spanish. In addition, during inspections at local business, these materials are handed to staff and business owners to help disseminate the information within the community.

List suggestions to increase the usefulness of quarterly meetings:

Host a series of presentations that focus on the changes in the stormwater industry including the RWQCB strategies. Emerging practices such as Low Impact Development (LID) should also be discussed at the quarterly meetings.

If quarterly Public Outreach Strategy meetings were not organized, explain why not and when this requirement will be implemented (*Principal Permittee only*).

Not applicable.

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- c) Approximately how many impressions were made last year on the general public about storm water quality via print, local TV, local radio, or other media? Not applicable.
- d) Describe efforts your agency made to educate local schools on storm water pollution.

The City of Pomona hosted an Earth Day celebration on April 22nd by focusing on stormwater pollution with an overall arching theme of "Pollution Stops at Your Front Door". The City invited the community at large to participate in the celebration. A display of the Earth's water cycle, information materials describing household products that can pollute stormwater and practices that can help protect stormwater discharges, physical stormwater treatment control BMPs (i.e. storm filter, trash curb screen, etc) and a looping video titled "After the Storm". Refer to the attachment section for a formal write-up.

- e) Did you provide all schools within each school district in Los Angeles County with materials necessary to educate a minimum of 50 percent of all school children (K-12) every 2 years on storm water pollution (*Principal Permittee only*)? Yes ☐ No ☐
- If not, explain why.

Not applicable.

- f) Describe the strategy developed to measure the effectiveness of in-school educational programs, including assessing students' knowledge of storm water pollution problems and solutions before and after educational efforts (*Principal Permittee only*).

Not applicable.

For Permit Years 2-6, attach an assessment of the effectiveness of in-school storm water education programs.

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- g) What is the behavioral change target that was developed based on sociological data and other studies (*Principal Permittee only*)?

Not applicable.

If no target has been developed, explain why and describe the status of developing a target.

Not applicable.

What is the status of meeting the target by the end of Year 6?

Not applicable.

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4. Pollutant-Specific Outreach

- a) Attach a description of each watershed-specific outreach program that your agency developed (*Principal Permittee only*). All pollutants listed in Table 1 (Section B.1.d.) must be included.
- b) Did your agency cooperate with the Principal Permittee to develop specific outreach programs to target pollutants in your area? Yes ☐ No ☒
- c) Did your agency help distribute pollutant-specific materials in your city? Yes ☒ No ☐
- d) Describe how your agency has made outreach material available to the general public, schools, community groups, contractors and developers, etc...

The City of Pomona hosted an Earth Day celebration on April 22nd by focusing on stormwater pollution with an overall arching theme of "Pollution Stops at Your Front Door". A display of the Earth's water cycle, information materials describing household products that can pollute stormwater and practices that can help protect stormwater discharges, physical stormwater treatment control BMPs (i.e. storm filter, trash curb screen, etc) and a looping video titled "After the Storm" . Refer to the attachment section for a formal write-up.

At the front desk counter of the Department of Public Works, there is a display a number of stormwater educational materials for all visitors including citizens, business owners, developers and contractors. We hand out information regarding stormwater pollution prevention. In addition, information is posted on the City's website.

5. Businesses Program

- a) Briefly describe the Corporate Outreach Program that has been developed to target gas stations and restaurant chains (*Principal Permittee only*).

Not applicable.

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- b) How many corporate managers did your agency (*Principal Permittee only*) reach last year? Not applicable
- c) What is the total number of corporations to be reached through this program (*Principal Permittee only*)? Not applicable
- d) Is your agency meeting the requirement of reaching all gas station and restaurant corporations once every two years (*Principal Permittee only*)? Yes ☐ No ☐
If not, describe measures that will be taken to fully implement this requirement.

Not applicable.

- e) Has your agency developed and/or implemented a Business Assistance Program? Yes ☐ No ☒
If so, briefly describe your agency's program, including the number of businesses assisted, the type of assistance, and an assessment of the program's effectiveness.

Not applicable.

6. Did you encourage local radio stations and newspapers to use public service announcements? Yes ☐ No ☒
How many media outlets were contacted? *0
Which newspapers or radio stations ran them?

* Refer to Principal Permittee media campaign.

Who was the audience?

* Refer to Principal Permittee media campaign.

7. Did you supplement the County's media purchase by funding additional media buys? Yes ☐ No ☒
Estimated dollar value/in-kind contribution: 0

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Type of media purchased: 0

Frequency of the buys: 0

Did another agency help with the purchase? Yes ☐ No ☒

8. Did you work with local business, the County, or other Permittees to place non-traditional advertising? Yes ☒ No ☐

If so, describe the type of advertising.

The County's target group over the past few years has been the "do-it-yourselfers" with the used oil recycling program. City staff has encouraged and assisted many of the automotive related businesses to help place various advertising pieces in their facilities. In addition, the City prints the (888) CLEAN-LA hotline number on its own used oil recycling program media that are distributed to the public to encourage proper/legal disposal/recycling of used oil/automotive fluids/filters.

9. Did you establish local community partnerships to distribute educational storm water pollution prevention material? Yes ☒ No ☐

Describe the materials that were distributed:

Continuing community partners are our active neighborhood and community groups. Group members have been supplied with "Stormwater Begins at Your Door" brochures and stormwater door hangers produced by the City. Groups have distributed these materials to other community members and neighbors; they are great "environmental stewards." Material subjects include - stormwater, watershed and pollution prevention topics. Refer to the attachment section.

Who were the key partners? Local community groups/school teachers

Who was the audience (businesses, schools, etc.)?

Community group members, Pomona citizens, Contractors and Land Developers.

10. Did you participate in or publicize workshops or community events to discuss storm water pollution? Yes ☒ No ☐

How many events did you attend? 1

11. Does your agency have a website that provides storm water pollution prevention information? Yes ☒ No ☐

If so, what is the address? <http://www.ci.pomona.ca.us/>

12. Has awareness increased in your community regarding storm water pollution? Yes ☒ No ☐

Do you feel that behaviors have changed? Yes ☒ No ☐

Explain the basis for your answers. Include a description of any evaluation methods that are used to determine the effectiveness of your agency's outreach.

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The ability to evaluate the increase in awareness and attitude changes can be measured by the public's interests in reporting stormwater related issues (e.g. discharges of non-stormwater to stormdrains, paint staining) and the number of phone calls received via the City's environmental reporting hotline from both the citizens and business owners throughout Pomona and neighboring cities. The citizens of Pomona understand the importance of protecting the environment.

13. How would you modify the storm water public education program to improve it on the City or County level?

Increased presence via advertisements using various media types (commercials, stationary and mobile billboards (i.e. MTA bus lines). Hosting more recycling events throughout the County which may include partnering with neighboring counties to increase effectiveness.

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B. Industrial/Commercial Facilities Program

1. Critical Source Inventory Database

Did you (individually or jointly) update the Database for Critical Sources Inventory?

Yes ☒ No ☐

Comments/Explanation/Conclusion:

This task is achieved through the Los Angeles RWQCB and the Principal Permittee.

2. Inspection Program

Provide the reporting data as suggested in the following tables.

Category	Initial Number of Facilities at the start of cycle proposed for inspection by categories (after the initial year, the updated number based on the new data)	Number of facilities inspected in the current reporting year	% Completed at the time of this report for present cycle (from the initial value, and from the updated value after first cycle)	Total number since permit adoption
Landfills	0	0	0	0
TSDf	0	0	0	0
...	0	0	0	0

Comments/Explanation/Conclusion:

Not applicable.

3. BMPs Implementation

Provide the reporting data as suggested in the following table.

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Category	Number of facilities inspected by category in this reporting year	Number of facilities identified as adequately implementing BMPs as specified in this reporting year	% adequately implementing out of total in this reporting year	Number of facilities required to implement or upgrade in this reporting year	Number of facilities inspected by category in this reporting cycle	Number of facilities identified as adequately implementing BMPs as specified in this reporting cycle	% adequately implementing out of total in this reporting cycle	Number of facilities required to implement or upgrade in this reporting cycle	Total Number during this permit adequately implementing	Total Number during this permit required to implement or upgrade
Landfills	0	0	0	0	0	0	0			
...	0	0	0	0	0	0	0			

Comments/Explanation/Conclusion: Not applicable.

4. Enforcement Activities

Provide the reporting data as suggested in the following tables.

Enforcement Actions by categories (e.g. Warning letter, NOV, referral to D.A., etc.)	Number of facilities issued enforcement actions in the current reporting year	Number of facilities issued enforcement actions in the current reporting cycle	Number of facilities (re)inspected due to enforcement actions in current reporting year	Number of facilities (re)inspected due to enforcement actions in current reporting cycle	Number of facilities brought into compliance in the current reporting year	Number of facilities brought into compliance in current reporting cycle	Total number of enforcement actions since permit adoption (by category)
Notice to Comply	6	6	6	6	6	6	768
Notice of Violation	0	0	0	0	0	0	236
Citation Issued	0	0	0	0	0	0	21
Referral to LARWQCB	0	0	0	0	0	0	48
DA Referral	0	0	0	0	0	0	6

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Facilities by category	Number of Warning letters	Number of NOVs	Number of Referral	Number of Other
Restaurants	0	0	0	0
Automotive	19	1	0	0
Industrial/Comm	34	5	0	0
Salvage Yards	2	0	0	0
RGOs	0	0	0	0

Comments/Explanation/Conclusion:

City staff believes that the program has a positive impact in obtaining compliance at various facilities/sites in removing pollutants from stormwater discharges. Increased compliance equates to decreased illegal stormwater discharges, thus resulting in a notable positive effect on the water quality within the region. During inspections and site visits, staff incorporates public education/awareness at the same time.

5. Program Implementation Effectiveness Assessment

Please give a brief assessment of the implementation of the program in removing pollutants from the storm water discharges. Please provide an explanation. Suggested improvements or adjustments based on the knowledge gained through this reporting period activities must be reflected in a change in the SQMP, if warranted.

Highly Effective ☐

Somewhat Effective ☒

Non-effective ☐

Comments/Explanation/Conclusion:

Although accurate assessment of the Inspection/Enforcement Program's overall performance in removing pollutants from stormwater discharges and pollution prevention—illegal dumping, continues to be a challenge. The Inspection/Enforcement Program appears to have a positive impact in obtaining compliance at our various facilities/sites. Thus, it can be concluded that the more facilities/sites that come into compliance by discontinuing illicit discharges, then it will result in a notable positive effect on the water quality in the region.

6. You must also submit a quarterly electronic submittal of your Industrial/Commercial Facilities Program activities.

Refer to the miscellaneous attachment section for the spreadsheet.

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C. Development Planning Program (Part 4.D)

1. Does your agency have a process to minimize impacts from storm water and urban runoff on the biological integrity of natural drainage systems and water bodies in accordance with requirements under CEQA, Section 404 of the CWA, local ordinances, and other legal authorities? Yes ☒ No ☐
 Attach examples showing how storm water quality impacts were addressed in environmental documents for projects over the past year. *Refer to the attachment section.*
2. Does your agency have procedures to include the following requirements in all priority development and redevelopment projects:
 - a) Maximize the percentage of permeable surfaces to allow more percolation of storm water into the ground? Yes ☒ No ☐
 - b) Minimize the quantity of storm water directed to impermeable surfaces and the MS4? Yes ☒ No ☐
 - c) Minimize pollution emanating from parking lots through the use of appropriate treatment control BMPs and good housekeeping practices? Yes ☒ No ☐
 - d) Provide for appropriate permanent measures to reduce storm water pollutant loads from the development site? Yes ☒ No ☐
3. List the types and numbers of BMPs that your agency required for priority projects to meet the requirements described above.

SD-10 Site Design & Landscape Planning; SD-35 Outdoor Work Areas
 SD-11 Roof Runoff Controls; SD-36 Outdoor Processing Areas; SD-12
 Efficient Irrigation; TC-10 Infiltration Trench; SD-13 Storm Drain Signage
 TC-11 Infiltration Basin; SD-30 Fueling Areas; TC-12 Retention/Irrigation
 SD-31 Maintenance Bays & Docks; TC-22 Extended Detention Basin
 SD-32 Trash Storage Areas; TC-30 Vegetated Swale; SD-33 Vehicle
 Washing Areas; TC-31 Vegetated Buffer Strip; SD-34 Outdoor Material
 Storage Areas; TC-32 Bioretention; MP-52 Drain Inlet; TC-50 Water Quality
 Inlet; MP-40 Media Filter

*California Stormwater Quality Association (CASQA) (New Development
 Redevelopment, Construction and Industrial Handbooks)*

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4. Describe the status of the development or implementation of peak flow controls in Natural Drainage Systems.

Consistent with the City's Environmental Services Section Policy, the post-development peak stormwater runoff discharge rates "...shall not exceed the estimated pre-development rate where the increased peak stormwater discharge will result in the increased potential for downstream disturbance." The policy is reviewed for adherence for all appropriate projects.

5. Has your agency amended codes and/or ordinances to give legal effect to the SUSMP changes required in the Permit? Yes ☒ No ☐
6. Describe the process your agency uses to include SUSMP design standards in new development and redevelopment project approvals.

SUSMP design standards (if required) are clearly stated in the Planning Division's Conditional Use Permit (CUP) for a proposed new/redevelopment project site. Once the Planning Commission approves the CUP, the project plans are submitted to the City for plan check and approval. All appropriate SUSMP requirements stated in the CUP must be part of the final project. The City requires the preparation and submittal of a SUSMP document (including project plans) for approval. Upon approval, the grading and building permits are issued. Prior to occupancy, the site is inspected for implementation of the approved SUSMP. Please refer to the attachment section for documentation of the City's Development Review process.

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7. How many of each of the following projects did your agency review and condition to meet SUSMP requirements last year?
- | | |
|---|---|
| a) Residential | 3 |
| b) Commercial | 0 |
| c) Industrial | 5 |
| d) Automotive Service Facilities | 0 |
| e) Retail Gasoline Outlets | 1 |
| f) Restaurants | 1 |
| g) Parking Lots | 2 |
| h) Projects located in or directly adjacent to or discharging directly to an environmentally sensitive area | 0 |
| i) Total number of permits issued to priority projects | 7 |
8. What is the percentage of total development projects that were conditioned to meet SUSMP requirements? 47%
9. How has your agency prepared to reduce the SUSMP threshold for industrial/commercial facilities to 1 acre from 100,000 square feet in 2003?

The City's Environmental Program Coordinator prepared City staff, developers, engineering firms, etc. for the SUSMP threshold reduction by means of circulating informational sheets and emails noting the change that occurred in March 2003. The Environmental Program Coordinator reviews all proposed projects for SUSMP compliance during the Planning Division's "Development Review" process. Appropriate comments and recommendations regarding SUSMP requirements are provided to the Planning staff for inclusion into the Conditional Use Permit (CUP).

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10. After 2003, how many additional projects per year will require/did require implementation of SUSMP requirements as a result of the lower threshold? ± 47%
11. Does your agency participate in an approved regional or sub-regional storm water mitigation program to substitute in part or wholly SUSMP requirements for new development? Yes ☐ No ☒
12. Has your agency modified its planning procedures for preparing and reviewing CEQA documents to consider potential storm water quality impacts and provide for appropriate mitigation? Yes ☐ No ☒

If no, provide an explanation and an expected date of completion.

The last revision to the CEQA documents was the Winter of 2007.

13. Did your agency update any of the following General Plan elements in the past year?

- a) Land Use Yes ☐ No ☒
- b) Housing Yes ☐ No ☒
- c) Conservation Yes ☐ No ☒
- d) Open Space Yes ☐ No ☒

If yes, please describe how watershed and storm water quality and quantity management considerations were included.

The Community Development Department's Planning Division is in the process of updating the various elements stated above of its General Plan.

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14. How many targeted staff were trained last year? Varies depending upon the needs' of the City.
15. How many targeted staff are trained annually? Varies depending upon the needs' of the City.
16. What percentage of total staff are trained annually? 0%
17. Has your agency developed and made available development planning guidelines? Yes ☒ No ☐
18. If no, what is the expected date that guidelines will be developed and available to developers?
19. What is the status of completion of the technical manual for siting and design of BMPs for the development community?

During the project's development review process, the Environmental Program Coordinator refers to the Los Angeles County's "Development Planning for Stormwater Mitigation Plan" reference manual and/or website link. This document including other related references are made available to City staff. In addition, the Coordinator developed and makes available a SWPPP and SUSMP tri-fold brochure, which provides the California Stormwater Quality Association's California BMP handbook website: www.cabmphandbooks.com.

Please refer to the miscellaneous attachment provided with the document upload process for the SWPPP and SUSMP tri-fold brochure example.

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D. Development Construction Program

1. Describe your agency's program to control runoff from construction activity at all construction sites within its jurisdiction.

Each construction project greater than one acre is logged into a spreadsheet for tracking purposes. Once the project has completed the environmental clearance process (e.g. - SWPPP/SUSMP/Demolition approval) the Environmental Program Coordinator issues a Letter of Environmental Approval that then releases the project to obtain a grading and/or building permit(s). During the construction phase of the project, inspectors note the use of appropriate or ineffective BMPs during an unannounced inspection visits. Correction Notices, Notices to Comply, and/or Notices of Violation(s) are issued for deficiencies. In addition, these notices serve to notify the Contractor, Developer, and/or Project Owner that they are out of compliance with the State Water Resources Control Board's General Construction Activities Stormwater Permit.

For projects less than one acre that require a Local SWPPP, the Letter of Environmental Approval releases the project to obtain a grading and/or building permit(s). The approval letter states the minimum construction BMPs that must be implemented at the project site.

Please refer to the miscellaneous attachment provided with the document upload process for the Letter of Environmental Approval example for projects greater than 1-acre (State SWPPP) and less than 1-acre (Local SWPPP).

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2. Does your agency require the preparation, submittal, and implementation of a Local Storm Water Pollution Prevention Plan (Local SWPPP) prior to the issuance of a grading permit for all sites that meet one or all of the following criteria?
- a) Will result in soil disturbance of one acre or greater Yes ☒ No ☐
- b) Is within, directly adjacent to, or is discharging directly to an environmentally sensitive area Yes ☒ No ☐
- c) Is located in a hillside area Yes ☒ No ☐
3. Attach one example of a local SWPPP
Refer to the attachment section for an example of a Local-SWPPP.
4. Describe the process your agency uses to require proof of filing a Notice of Intent for coverage under the State General Construction Activity Storm Water permit and a certification that a SWPPP has been prepared prior to issuing a grading permit?

Prior to the issuance of the Letter of Environmental Approval (prior to the issuance of a grading/building permit), the City requires that the SWPPP document contains a copy of the WDID letter from the State Water Resources Control Board (SWRCB) acknowledging the receipt of the Notice of Intent. If the applicant cannot produce a response letter from the SWRCB, the City requires the applicant to provide a copy of the post office stamped certified return receipt addressed to the SWRCB Stormwater Unit. In addition, the City requires a "wet" signature copy of the SWPPP, which is retained by the Environmental Coordinator.

5. How many building/grading permits were issued to sites requiring Local SWPPPs last year? 5
6. How many building/grading permits were issued to sites requiring coverage under the General Construction Activities Storm Water Permit last year? 4
7. How many building/grading permits were issued to construction site less than one acre in size last year? 5
8. How many construction sites were inspected during the last wet season? 5
9. Complete the table below.

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Type of Violation	# of Violations	% of Total Inspections	# of Follow-up Inspections	# of Enforcement Actions
Off-site discharge of sediment	0	0%	0	0
Off-site discharge of other pollutants	0	0%	0	0
No or inadequate SWPPP	1	2%	1	0
Inadequate BMP/SWPPP implementation	2	3%	2	0

10. Describe the process for taking enforcement actions against construction site violations, including the types of actions that are taken.

In most cases, the City utilizes a “progressive enforcement” set of procedures modeled by USEPA guidelines. However, depending upon the severity of the violation; whether it was a “knowing” violation; and/or consideration of the site’s recalcitrant history, the City may determine that is necessary to elevate the level of enforcement to protect the community.

The first step in the progressive enforcement procedures is generally a verbal warning from the inspector, which is notated on a daily inspection report or a site inspection report. The second/third steps (depending on the severity of the violation) is the issuance of a Correction Notice; Notice to Comply; and/or a Notice of Violation and Order to Comply letter from the Environmental Program Coordinator stating the violation(s) and indicating the legal authority to enforce further action, if deemed necessary. The third/fourth steps (depending on the severity of the violation) would be a Notice of Violation and Order to Comply or a citation. The final step would be notification to the Los Angeles Regional Water Quality Control Board staff.

11. Describe the system that your agency uses to track the issuance of grading permits.

The Building and Safety Division utilizes a customized in-house database system for tracking grading/building permits. Once the grading permit is issued, the Environmental Program Coordinator utilizes a database to track the inspection and enforcement actions at each site.

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E. Public Agency Activities (Part 4.F)

1. Sewage System Maintenance, Overflow, and Spill Prevention
(only applicable to agencies that own and/or operate a sanitary sewer system)
- a) Has your agency developed and implemented a response plan for sanitary sewer overflows that includes the requirements in Order 01-182? Yes ☒ No ☐
- b) How many sanitary sewer overflows occurred within your jurisdiction? 5
- c) How many did your agency respond to? 5
- d) Did your agency investigate all complaints received? Yes ☒ No ☐
- e) How many complaints were received? 5
- f) Upon notification, did your agency immediately respond to overflows by containment? Yes ☒ No ☐
- g) Did your agency notify appropriate sewer and public health agencies when a sewer overflowed to the MS4? Yes ☒ No ☐
- h) Did your agency implement a program to prevent sewage spills or leaks from sewage facilities from entering the MS4? Yes ☒ No ☐

If so, describe the program:

The City of Pomona Utility Services Department's (USD) Wastewater Division has a vigilant preventative maintenance program, which includes scheduled vector clean outs, rodding procedures, and closed circuit television of various sections to assist in preventing potential blockage situations. In addition, USD staff works with the Environmental Program Coordinator in situations where blockage of grease and/or sediment has been found built up in a sewer line; indicating improper dumping and/or discharging of material(s) in the sewer line.

- i) Did your agency implement a program to identify, repair, and remediate sanitary sewer blockages, exfiltration, overflow, and wet weather overflows from sanitary sewers to the MS4? Yes ☒ No ☐

If so, describe the program:

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All sections are identified from the CCTV videos, mapped, and scheduled (by priority) for repairs and/or maintenance. This is an ongoing program for the Wastewater Division which has proven to be successful.

2. Public Construction Activities Management

- a) What percentage of public construction sites 5 acres or greater in size did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit ? 100 %
- b) Give an explanation for any sites greater than 5 acres that were not covered:

None, all were covered.

- c) What is the total number of active public construction sites? 4
- How many were 5 acres or greater in size? 1

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- d) (After March, 2003) Did your agency obtain coverage under the State of California General Construction Activities Storm Water Discharge Permit coverage for public construction sites for sites one acre or greater? Yes ☒ No ☐

3. Vehicle Maintenance/Material Storage Facilities/Corporation Yards Management

- a) Did your agency implement pollution prevention plans for each public vehicle maintenance facility, material storage facility, and corporation yard? Yes ☒ No ☐

Each of the three (3) Pomona city yard sites are adhering to their site specific Stormwater Pollution Prevention Plans (SWPPP), incorporating all of the currently implemented BMPs and newly implemented BMPs since the last SWPPP revision. To emphasize the importance of proper BMP implementation during maintenance operations, the City's Divisions have developed and implemented new Rules & Regulations that include Standard Operating Procedures (SOPs), which include appropriate BMP implementation in the field.

- b) Briefly describe how your agency implements the following, and any additional, BMPs to minimize pollutant discharges in storm water:
- (1) Good housekeeping practices
 - (2) Material storage control
 - (3) Vehicle leaks and spill control
 - (4) Illicit discharge control

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The following Municipal CASQA BMP Fact Sheets are included in the appropriate operational SWPPP:

SC-10 Non-Stormwater Discharges
 SC-11 Spill Prevention, Control & Cleanup
 SC-20 Vehicle and Equipment Fueling
 SC-21 Vehicle and Equipment Cleaning
 SC-22 Vehicle and Equipment Repair
 SC-30 Outdoor Loading/Unloading
 SC-31 Outdoor Container Storage
 SC-32 Outdoor Equipment Maintenance
 SC-33 Outdoor Storage of Raw Materials
 SC-34 Waste Handling & Disposal
 SC-41 Building & Grounds Maintenance
 SC-43 Parking/Storage Area Maintenance
 SC-60 Housekeeping Practices
 SC-70 Road and Street Maintenance
 SC-71 Plaza and Sidewalk Cleaning
 SC-72 Fountain & Pool Maintenance
 SC-73 Landscape Maintenance
 SC-74 Drainage System Maintenance
 SC-75 Waste Handling and Disposal
 SC-76 Water & Sewer Utility Maintenance

- c) Are all Permittee owned and/or operated vehicle/equipment wash areas self-contained, covered, equipped with a clarifier, and properly connected to the sanitary sewer? Yes ☒ No ☐

If not, what is the status of implementing this requirement?

Vehicle Maintenance/Material Storage Facilities/Corporation Yards Management SWPPPs have been completed a number of years ago. The City's corporate yard (where a clarified unit is located) maintenance program procedures require bi-monthly inspection and cleaning. The program was developed to keep the wash racks clean, healthy and clog-free. Further, the City has banned the cleaning of service vehicles at the Vehicle Maintenance yard to help reduce the discharge of non-stormwater and waste water discharges to the stormdrain system (MS4).

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- d) How many Permittee owned and/or operated vehicle/equipment wash areas are scheduled to be redeveloped to include the BMPs listed above?

0

4. Landscape and Recreational Facilities Management

- a) Has your agency developed a standardized protocol for the routine and non-routine application of pesticides, herbicides (including pre-emergents), and fertilizers?

Yes ☒ No ☐

Briefly describe this protocol:

The Community Services Department's Parks and Recreation Division has a "No Rinsate Policy" that is part of their Standard Operating Procedures (SOPs). In addition, each sprayer is certified by the State of California and is responsible for following the City's No Rinsate Policy; Spill Prevention, Control and Countermeasure (SPCC) Plan; OSHA Regulations; and Municipal NPDES BMPs.

- b) How does your agency ensure that there is no application of pesticides or fertilizers immediately before, during, or immediately after a rain event or when water is flowing off the area to be applied?

The Parks and Recreation implements their own schedules and is duly aware of Southern California weather patterns and schedules applications accordingly throughout the year. In addition, key personnel monitor the National Weather Services website via the City's computer system. Additionally, the Parks' staff controls the City parks and open space irrigation system via computer, clock and/or manual devices, and therefore are able to control irrigation flows to prevent runoff after spray applications have occurred at a particular site or section.

- c) Are any banned pesticides, herbicides, fungicides, or rodenticides stored or applied in your agency's jurisdiction that you know of?

Yes ☐ No ☒

If so, list them:

--

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- d) What percentage of your agency's staff that apply pesticides are certified by the California Department of Food and Agriculture, or are under the direct supervision of a certified pesticide applicator? 100%
- e) Describe procedures your agency has implemented to encourage retention and planting of native vegetation and to reduce water, fertilizer, and pesticide needs:

The Public Works Department has developed a "Citywide Landscape Palette" which all projects must adhere to. This program encourages water conservation practices, planting of native vegetation which is drought, pest, and weather tolerant. In addition, our Planning Division policies, codes and ordinances take these issues into consideration for all development projects.

5. Storm Drain Operation and Management

- a) Did your agency designate catch basin inlets within its jurisdiction as Priority A; Priority B; and Priority C? Yes ☒ No ☐
- b) How many of each designation exist in your jurisdiction?
- | | |
|-------------|-----|
| Priority A: | 53 |
| Priority B: | 119 |
| Priority C: | 332 |
- c) Is your city subject to a trash TMDL? Yes ☐ No ☒
- d) If yes, describe the activities and/or implementation measures that your agency conducted pursuant to the TMDL and any other trash reduction efforts that occurred.

The City is not currently a co-Permittee of a Trash TMDL.

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- e) How many times were all Priority A basins cleaned last year? ±4
- f) How many times were all Priority B basins cleaned last year? ±2
- g) How many times were all Priority C basins cleaned last year? ±1
- h) How much total waste was collected in tons from catch basin clean-outs last year? 70.5
- i) Attach a record of all catch basins in your jurisdiction. This shall identify each basin as City or County owned, and Priority A, B, or C. For all basins that are owned and operated by your agency, include dates that each was cleaned out over the past year.
- j) Did your agency place and maintain trash receptacles at all transit stops within its jurisdiction. Yes ☒ No ☐
- k) How many new trash receptacles were installed last year? ± 30
- l) Did your agency place special conditions for events that generated substantial quantities of trash and litter including provisions that:
- (1) Provide for the proper management of trash and litter generated from the event? Yes ☒ No ☐
- (2) Arrange for temporary screens to be placed on catch basins? Yes ☐ No ☒
- (3) Or for catch basins in that area to be cleaned out subsequent to the event and prior to any rain? Yes ☒ No ☐
- m) Did your agency inspect the legibility of the catch basin stencil or labels? Yes ☒ No ☐
What percentage of stencils were legible? 100%

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- n) Were illegible stencils recorded and re-stenciled or re-labeled within 180 days of inspection? Yes ☒ No ☐
- o) Did your agency visually monitor Permittee-owned open channel storm drains and other drainage structures for debris at least annually and identify and prioritize problem areas of illicit discharge for regular inspection? Yes ☒ No ☐
Is the prioritization attached? Yes ☐ No ☒
- p) Did your agency review its maintenance activities to assure that appropriate storm water BMPs are being utilized to protect water quality? Yes ☒ No ☐
What changes have been made?

None to report at this time.

- q) Did your agency remove trash and debris from open channel storm drains a minimum of once per year before the storm season? Yes ☐ No ☒
- r) How did your agency minimize the discharge of contaminants during MS4 maintenance and clean outs?

A vactor system is utilized to remove debris from the catch basins. This enables the City crews to clean the catch basins, connectors and portions of the lateral.

- s) Where is removed material disposed of?

The debris removed from catch basins is placed in plastic lined roll-off bin at an appropriate staging area. When the roll of bin was near full capacity, the bin would be tarped and hauled to the local landfill.

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6. Streets and Roads Maintenance

- a) Did your agency designate streets and/or street segments within its jurisdiction as one of the following:
- (1) Priority A – streets and/or street segments that are designated as consistently generating the highest volumes of trash and/or litter? Yes ☒ No ☐
 - (2) Priority B - streets and/or street segments that are designated as consistently generating moderate volumes of trash and/or litter? Yes ☒ No ☐
 - (3) Priority C – streets and/or street segments that are designated as generating low volumes of trash and/or litter? Yes ☒ No ☐
- b) Did your agency perform all street sweeping in compliance with the permit and according to the following schedule:
- (1) Priority A – These streets and/or street segments shall be swept at least two times per month? Yes ☒ No ☐
 - (2) Priority B - Each Permittee shall ensure that each streets and/or street segments is cleaned at least once per month? Yes ☒ No ☐
 - (3) Priority C – These streets and/or street segments shall be cleaned as necessary but in no case less than once per year? Yes ☒ No ☐

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- c) Did your agency require that saw cutting wastes be recovered and disposed of properly and that in no case shall waste be left on a roadway or allowed to enter the storm drain? Yes ☒ No ☐
- d) Did your agency require that concrete and other street and road maintenance materials and wastes be managed to prevent pollutant discharges? Yes ☒ No ☐
- e) Did your agency require that the washout of concrete trucks and chutes only occur in designated areas and never into storm drains, open ditches, streets, or catch basins leading to the storm drain system? Yes ☒ No ☐
- f) Did your agency train its employees in targeted positions (whose interactions, jobs, and activities affect storm water quality) regarding the requirements of the storm water management program to:
- (1) Promote a clear understanding of the potential for maintenance activities to pollute storm water? and Yes ☒ No ☐
- (2) Identify and select appropriate BMPs? Yes ☒ No ☐

7. Parking Facilities Management

- a) Did your agency ensure that Permittee-owned parking lots be kept clear of debris and excessive oil buildup and cleaned no less than 2 times per month and/or inspected no less than 2 times per month to determine if cleaning is necessary. Yes ☒ No ☐
- b) Were any Permittee-owned parking lots cleaned less than once a month? Yes ☒ No ☐
How many? Bi-monthly

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8. Public Industrial Activities Management

- a) Did your agency, for all municipal activity considered an industrial activity under USEPA Phase I storm water regulations, obtain separate coverage under the State of California General Industrial Activities Storm Water Discharge Permit no later than December 31, 2001? Yes ☐ No ☒
- b) Does your agency serve a population of less than 100,000 people? Yes ☐ No ☒

9. Emergency Procedures

- a) In case of real emergencies, did your agency repair essential public services and infrastructure in a manner to minimize environmental damage? Yes ☒ No ☐
- b) Were BMPs implemented to the extent that measures did not compromise public health and safety? Yes ☒ No ☐

10. Feasibility Study

- a) Did your agency cooperate with the County Sanitation Districts of Los Angeles County to prepare a study which investigates the possible diversion of dry weather flows or the use of alternative treatment control BMPs? Yes ☐ No ☒
- b) Did your agency review its individual prioritized list and create a watershed based priority list of drains for potential diversion and submit a listing of priority diversions to the Regional Board Executive Officer? Yes ☐ No ☒

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F. Illicit Connections and Illicit Discharges (IC/ID) Elimination Program (Part 4.G)

1. Attach a copy of your agency's IC/ID Elimination Implementation Program (Part 4.G.1.a.). Please refer to the miscellaneous attachments for the IC/ID program booklet
2. Attach a map of your storm drain system showing all permitted connections (if available), and the locations of all illicit connections and discharges that occurred last year (Part 4.G.1.b). If your agency has not completed this requirement, describe the status of the development of a baseline map, including an expected completion date.

Refer to the miscellaneous attachments for a map of the stormdrain system.

3. Describe your enforcement procedures for eliminating illicit discharges and terminating illicit connections.

For illicit discharges, the City utilizes a progressive enforcement action. Illicit connections receive a "Cease and Desist Order" with a brief timeframe to comply. If compliance is not achieved within the specified timeframe, then the City will present a case and file with the District Attorney's office. Generally, the city has obtained compliance prior to such extreme enforcement measures. Periodic unannounced follow-up inspections are made to ensure continued compliance.

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4. Describe your record keeping system to document all illicit connections and discharges.

The City currently utilizes a database system to track the location of illicit connections and discharges. Additionally, when enforcement action is taken, a case file is prepared, and documented in the permanent hard copy files for future reference, if necessary.

5. What is the total length of open channel that your agency owns and operates? 21 acres
6. What length was screened last year for illicit connections? 100%
7. What is the total length of closed storm drain that your agency owns and operates? Unknown
8. What length was screened last year for illicit connections? 100%
9. Describe the method used to screen your storm drains.

The Los Angeles County Flood Control District runs a CCTV to screen the closed storm drain system and a visual method is utilized by City crews who walk the entire length of the open drainage channel areas in the field.

10. Provide the reporting data for illicit connections as suggested in the following table (you may submit a spreadsheet from your database that contains the information).

Year	Total # reported/ identified	Total # investigated	# that conveyed exempt discharges or NPDES permitted	# that conveyed illicit discharges that were terminated	# that were removed	# that resulted in enforcement action	# that resulted in <i>other</i> actions
01/02	5	5	5	5	4	5	0
02/03	2	2	2	1	1	1	0
03/04	3	3	1	1	1	1	0

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04/05	2	2	0	2	2	0	2
05/06	7	7	0	7	7	7	0
06/07	3	3	0	1	2	3	0
07/08	0	0	0	0	0	0	0
08/09	0	0	0	0	0	0	0

11. Explain any *other* actions that occurred in the last year.

12. What is the average time it takes your agency to initiate an illicit connection investigation after it is reported?

4 hours

a) Were all identified connections terminated within 180 days?

Yes ☐ No ☒

b) If not, explain why.

13. Provide the reporting data for illicit discharges as suggested in the following table (you may submit a spreadsheet from you database that contains this information).

Year	Total # reported	Total # that were discontinued/ cleaned up voluntarily through enforcement and the source was identified	# that were cleaned up but the source could not be identified	# that resulted in no evidence of discharge	# that were determined to be conditionally exempt	# that were exempt or in compliance and the source identified	# that resulted in enforcement action
01/02	121	33	74	12	2	0	27
02/03	159	49	75	26	7	2	32
03/04	192	68	109	11	3	1	54
04/05	251	235	13	3	0	0	202
05/06	309	212	97	5	0	0	189
06/07	291	198	82	11	0	0	198

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07/08	0	0	0	0	0	0	0
08/09	0	0	0	0	0	0	0

14. What is the average response time after an illicit discharge is reported?

4 hours

a) Did any response times exceed 72 hours? Yes ☐ No ☒

b) If yes, explain why.

15. Describe the your agency's spill response procedures.

The following are tasks pertinent to the City's spill response procedures:

- Respond to spill notification in a timely manner;
- Assess the situation;
- Contain spill via City crew, County HazMat, or environmental contractor;
- Notify regulatory agency and/or OES, if necessary;
- Photo document spill;
- Obtain statement from witness(s), reporting party, or other appropriate parties; and
- Complete written report in a timely manner.

16. What would you do differently to improve your agency's IC/ID Elimination Program?

17. Attach a list of all permitted connections to your storm sewer system.
None, connections for development projects are made to Los Angeles County Flood Control District.

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V. Monitoring

Briefly describe any storm water monitoring activities that are not required by Order No. 01-182 that your municipality conducted, participated in, or received funding to conduct in the past fiscal year. These activities should correspond with the dollar amount you listed in Table 2.

The City continues to participate in the Middle Santa Ana River (MSAR) Pathogens TMDL Task Force under the cooperative agreement with the Santa Ana Watershed Project Authority and co-Permittees. The Task Force was formed to help address the MSAR Pathogens TMDL on a watershed basis.

VI. Assessment of Program Effectiveness

- A. Attach a summary of the effectiveness of your storm water management program. This summary should include, at a minimum, the following:
1. An assessment of your agency's compliance with permit requirements, based on your responses to the questions in this form;
 2. Descriptions of any evaluation methods that your agency uses to determine the effectiveness of your storm water management program;
 3. A summary of the strengths and weaknesses of your agency's storm water management program;
 4. A list of specific program highlights and accomplishments;
 5. A description of water quality improvements or degradation in your watershed over the past fiscal year;
 6. Interagency coordination between cities to improve the storm water management program;
 7. Future plans to improve your agency's storm water management program; and
 8. Suggestions to improve the effectiveness of your program or the County model programs.

Refer to the attachment section for the Watershed Assessment.

- B. On a scale of 1 to 10 (10 being full implementation of requirements by their deadlines), rate your municipality's level of compliance with Order No. 01-182.

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- C. List any suggestions your agency has for improving program reporting and assessment.

No suggestions at this time.